

REMARKS

Initially, Applicant would like to express appreciation to the Examiner for the detailed Official Action provided. Upon entry of the present paper, claims 6-13 will remain pending in the present application for consideration by the Examiner. The Examiner has rejected claims 6, 8, 9 and 11 under 35 U.S.C. § 103(a) as being unpatentable over LAI (previously of record) in view of U.S. Patent No. 6,879,315 to GUY et al. Specifically, the Examiner has found that LAI teaches all of the claimed limitations except the planar pad contact face to contact the touch pad, but has found that GUY teaches a planar pad 144, and has concluded that it would have been obvious to include this planar pad into the system of LAI.

Applicant respectfully traverses the Examiner's rejection, and notes that neither of these references, either taken alone or in any proper combination, teaches or suggests at least the claimed input element having an electrically-conductive generally planar pad contact face, as generally recited in independent claims 6 and 11.

As the Examiner has correctly noted, LAI does not disclose the planar contact face configured to contact the touch pad; however, Applicant notes that GUY further fails to teach or suggest this limitation. Specifically, the planar pad 144 (shown in Figs. 9A-9D) of GUY is part of a wrist-rest 142, and that this wrist-rest 142 is not part of an input element. Applicant further notes that the Examiner's citation of Col. 15, lines 60-63 (*i.e.*, "[a]ctual dimensions may be varied, as necessary to accommodate a particular haptic interface configurations, orientation, and work volume") refers to the configuration of the contact pad 144 of the wrist-rest 142 and not the configuration of an input element. Further, Applicant notes that the stylus 40 (user connection

element) of GUY does not teach or suggest at least the generally planar pad contact face, but rather shows a rounded tip (shown at the left side of Fig. 6 and described at col. 13, line 63 – col. 14, line 20). In this regard, Applicant respectfully submits there would be absolutely no motivation whatsoever to combine a contact pad of a (non-electrically conductive) wrist rest with the pressure-sensitive pen to arrive at the present claimed invention. Thus, Applicant submits that GUY fails to provide any teachings which could reasonably be characterized as curing the above-noted deficiencies in the teachings of LAI.

One advantage of a non-limiting feature of the present invention (as described in, *inter alia*, paragraph [0014] of the present specification) provides a generally planar contact face of an input element, of which contact to the touch-pad causes capacitance change sufficient enough to cause movement of a pointer (*e.g.*, a pointer icon) displayed on the computer display device.

Applicant conducted experiments to move the pointer by moving variously-configured input elements on a touch-pad surface. The results indicated that a pointed stylus, a ball-point stylus, or other device that did not have a generally planar contact face did not result in reliable synchronous movements of the pointer, suggesting that only substantial face-to-face contact of a generally planar contact face to the touch-pad surface causes capacitance change on the touch-pad so as to result in synchronous movement of the pointer.

In view of the above, the present claimed invention does not use a stylus having a curved top, or a ball rolling on a pad (such as those disclosed by *e.g.*, LAI, GUY, and TOYODA). Specifically, Applicant found that such configurations did not provide reliable movement of the pointer without using other mechanisms (*i.e.*, mechanisms in addition to that of a touch-pad) for instructing

movement of the pointer, such as pressure, rolling a ball and/or light sensors. It is thus respectfully submitted that the invention as claimed in independent claims 6 and 11 is patentable over the applied references.

With respect to the Examiner's rejection of dependent claims 8-9 as being unpatentable under 35 U.S.C. § 103(a) over LAI in view of GUY, as well as the rejection of dependent claims 7, 10, 12 and 13 as being unpatentable under 35 U.S.C. § 103(a) over LAI in view of GUY and TOYODA, Applicant notes that these claims are dependent from one of allowable independent claims 6 or 11, which are allowable for at least the reasons discussed *supra*. Thus, these dependent claims are also allowable for at least the reasons discussed *supra*. Further, all dependent claims set forth a further combination of elements neither taught nor disclosed by any of the applied references. For example (as noted in Applicant's previous response of September 28, 2006, all the arguments of which are expressly incorporated herein), LAI is not configured to input data to an information processing apparatus via changes of static capacitance (as claimed in dependent claims 8-9), but rather is directed to a resistive pressure sensitive electromagnetic pen (*see, e.g.*, col. 1, lines 52-53).

Thus, Applicant respectfully submits that each and every pending claim of the present application meets the requirements for patentability at least under 35 U.S.C. § 103, and respectfully requests the Examiner to indicate the allowance of each and every pending claim in the present application.


SUMMARY AND CONCLUSION

In view of the fact that none of the art of record, whether considered alone, or in any proper combination thereof, discloses or suggests the present invention, and in further view of the above remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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